

DEPP Review of PR Strategic Plan and Summary of Actions

DEPP RPB reviewed the English translation of the SWMA's 2004 *Strategic Plan for the Management of Solid Residues in Puerto Rico (Strategic Plan)*, and SWMA's *Summary of Actions*. These submissions were received on March 1, 2006 and were provided in response to the RA's November 2, 2005 letter to the PR Governor, in which EPA requested a copy of the most current Solid Waste Management Plan for Puerto Rico.

Strategic Plan:

- Focuses on infrastructure development for waste reduction and recycling;
- Was developed based on the results of a comprehensive Waste Characterization Study, completed in 2003, which EPA partially funded;
- Was intended to supplement existing documentation and data on overall solid waste management in Puerto Rico;
- Includes 138 discrete strategic actions intended to develop infrastructure and promote participation in waste reduction and recycling in Puerto Rico;
- DEPP recommends collaborating with PR on select strategic actions. This recommendation is reflected in EPA's comments letter.

Summary of Actions:

- Included with the Strategic Plan was a Summary of Actions document which addresses:
 - Proposed landfill expansions and landfill closures which were developed based on the Strategic Plan and Landfill Reaching Capacity Study;
 - Landfill compliance requirements associated with the joint SWMA-EQB Compliance Program;
 - Compliance and infrastructure outreach to municipalities;
 - Financial assistance for landfill compliance;
 - Comprehensive solid waste management master implementation plan.
- References several reports and documents including a *Landfill Reaching Capacity, Study Progress Reports, Recommended Environmental Improvements Design Drawings*, and a *Dynamic Programmatic Implementation Plan*. Based on SWMA's description of this last document, it appears similar to that of an ISWMP.
 - In its comment letter, EPA requested copies and/or English translations of these reports and documents.

Neither the *Strategic Plan* nor the *Summary of Actions* addresses the specific public outreach and financing information related to the landfill program which EPA requested in its November 2, 2005 letter. As it appears the public outreach initiative has not yet commenced, EPA discussed coordination of this effort in its comments.

Integrated Solid Waste Management Plan

The existing reports, combined with the *Summary of Actions* document and the reports referenced therein, could serve as a comprehensive foundation for an *Integrated Solid Waste Management Plan*.

- In its cover letter, EPA notes that in a separate mailing it will be transmitting, for Puerto Rico's reference, copies of ISWMPs developed by the Territory of Guam, the Commonwealth of the Northern Mariana Islands, and the State of Hawaii.

EPA's Review and Response

DEPP coordinated closely with DECA in its review of the *Strategic Plan* and *Summary of Actions*, especially with respect to its comments addressing landfills or other facilities currently located or being planned in environmentally sensitive areas. DEPP has drafted a response to the *Strategic Plan* and *Summary of Actions*, including a cover letter outlining EPA's overall concerns, as well as detailed comments in an attachment. Both currently are circulating for final review.